

**LORETTA NELSON,  
Individually and on behalf of  
All others Similarly Situated,**

reached in adversarial proceedings represents a fair and equitable compromise of a bona fide wage and hour dispute, the settlement may be approved, and stipulated judgment entered.” *Hill v. World Wide Technology Holdings Co, Inc.*, No. 4:11CV02108, 2012 WL 5285927, at\*1 (E.D. Mo. Oct. 25, 2012) (Fleissig, J.) (quoting *Simmons v. Enter. Holdings, Inc.*, No. 4:10CV00625, 2012 WL 2885919, at \*1 (E.D. Mo. July 13, 2012)) (citing cases).

5. As such, the Court must find that (1) this litigation involves a bona fide dispute, (2) the Parties’ proposed settlement is fair and equitable to all parties concerned and (3) the proposed settlement contains an award of reasonable attorney fees. *Id.* (citing *Grove v. ZW Tech, Inc.*, No. 11-2445-KHV, 2012 WL 4867226, at \*2-3 (D. Kan. Oct. 15, 2012)).

6. The current FLSA litigation involves a bona fide dispute.

7. The settlement being submitted to the Court is not only fair and adequate but also promotes judicial economy. The Parties’ Settlement Agreement and General Release is in the best interest of the Parties and counsel, as it represents a fair and reasonable compromise of this lawsuit given the amount of damages claimed.

**WHEREFORE**, Plaintiff Loretta Nelson, and Defendant Niangua R-V- School District respectfully request that the Court approve the Settlement Agreement and General Release, which will be filed under seal contemporaneously herewith.

Respectfully submitted,

**MICKES O'TOOLE, LLC**

By: /s/ Vincent D. Reese

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that on the 15<sup>th</sup> day of May, 2020, a copy of the foregoing Joint Motion to Approve Settlement was served via the court's electronic filing system.

/s/ Kathryn B. Forster